REMARKS

This is in response to the Office Action dated February 1, 2005. Claims 8-14, 17, 19 and 22-122 are pending.

It is noted that Judgment was entered by the Board in favor of applicant in Interference No. 105,203, in which this application was involved. After the case was returned to the Examiner, the Office Action dated February 1, 2005 was mailed. An IDS has been filed herewith to, *inter alia*, make formally of record art that was filed with the Board during the aforesaid Interference (even though it was previously filed with the Board). It is noted that JP 10-282482 and 10-282514 are Japanese counterparts of the Ichimura US reference already considered by the Examiner in this case. Also, for purposes of completeness of the record, English translations of two references already considered by the Examiner in this case has also been included in the IDS (it is unclear to the undersigned whether or not the Examiner has already considered these translations).

English translations of the priority documents (4) for the instant application has also been filed herewith.

It is noted that claims 23, 38, 39, 45 and 49 have been slightly modified to address formality and/or grammar issues. New claims 108-122 have been added. New claim 108 is similar to claim 30 filed February 20, 2003, and thus is proper under 35 U.S.C. Section 135. New claims 110 and 113 are similar to, *inter alia*, claims 35 and 38, respectively, filed February 20, 2003, and are thus proper under 35 U.S.C. Section 135. New claims 109

New claims 114-122 have been copied from U.S. Patent No. 6,410,358 (corresponding to claims 1-9 of the '358 Patent). Since this subject matter was being claimed (see other

alternatives of the count above) as of February 20, 2003, these claims are proper under 35 U.S.C. Section 135.

Pursuant to the Examiner's requirement set forth in section/paragraph 2 of the Office Action dated February 1, 2005, applicant hereby complies with § 41.202(a)(1)-(6).

Proposed Count {§41.202(a)(1)-(2)}

Applicant hereby proposed the following count for an interference with U.S. Patent No. 6,410,358:

Claim 28 of 09/406,684

OR

Claim 19 of 09/406,684

OR

Claim 22 of 09/406,684

OR

Claim 26 of 09/406,684

OR

Claim 27 of 09/406,684

OR

Claim 39 of 09/406,684

OR

Claim 50 of 09/406,684

OR

Claim 106 of 09/406,684

OR

Claim 108 of 09/406,684

OR

Claim 114 of 09/406,684

OR

Claim 116 of 09/406,684

OR

Claim 118 of 09/406,684

OR

Claim 1 of U.S. Patent No. 6,410,358

OR

Claim 3 of U.S. Patent No. 6,410,358

OR

Claim 5 of U.S. Patent No. 6,410,358.

The alternatives of the count (i.e., claims 19, 22, 26, 27, 28, 39, 50, 106, 108, 114, 116, and 118 of 09/406,684, and claims 1, 3 and 5 of U.S. Patent No. 6,410,358) define the same patentable invention because they each describe essentially the same method of, *inter alia,* making a liquid crystal display including a reflective layer, the method comprising using two exposures through two different masks to pattern a photosensitive material (e.g., photosensitive insulation film) so that one exposure is used in forming a contact hole(s) and the other exposure is used in forming asperity(ies) or concave portions on the surface of the photosensitive material; developing the photosensitive material and removing parts thereof, and forming a reflecting film or electrode thereover. Whether to use a positive photosensitive material, or a negative

photosensitive material, is an obvious matter of design choice as evidenced by Mitsui (U.S. Patent No. 5,204,765).

Claims Corresponding to the Proposed Count {§41.202(a)(2)}

It is respectfully submitted that the following claims of the instant application, and of U.S. Patent No. 6,410,358, *correspond* to the aforesaid count:

(a) 09/406,684: claims 8, 19, 22-33, 35, 38-44, 46, 49-57, 106-108, 110, 113 & 114-122.

(b) 6,410,358: Claims 1-9.

Thus, it is respectfully submitted that at least claims 8, 19, 22-33, 35, 38-44, 46, 49-57, 106-108, 110, 113 & 114-122 of the instant application (09/406,684) interfere with claims 1-9 of U.S. Patent No. 6,410,358.

Independent claims 19, 22, 26, 27, 28, 39, 50, 106, 108, 114, 116 and 118 of 09/406,684 correspond to the count because each is identical to a corresponding alternative of the count. Likewise, independent claims 1, 3 and 5 of U.S. Patent No. 6,410,358 correspond to the count because each is identical to a corresponding alternative of the count.

In the communication dated March 8, 2004 declaring Interference No. 105,203, the USPTO indicated that, and provided reasons why, claims 8, 23-25, 28-38, 40-49, 51-57 and 107 corresponding to one alternative of the above count. Thus, it is believed that the Examiner believes that these claims correspond to the aforesaid proposed count, and that claims 110, 113, 115, 117 and 119-122 correspond to the count for similar reasons.

Claims 2, 4 and 7 of U.S. Patent No. 6,410,358 also correspond to the count. These claims recite heating the photosensitive resin film to give edges of the concave a gentler slope after developing the photosensitive resin. It is noted that heating is also required in many

alternatives of the aforesaid count. Thus, this features does not patentably distinguish these claims from the aforesaid proposed count.

Claim 6 of U.S. Patent No. 6,410,358 also corresponds to the count. Claim 6 states that the lower conductive film constitutes the transistor. This feature does not patentably distinguish this claim from the count.

Claims 8 and 9 of U.S. Patent No. 6,410,358 also corresponds to the count. Claims 8 and 9 recite a different order in which the exposures are performed. The ordering of the claimed steps recited in these claims[1] does not patentably distinguish these claims from the count.

Claim Chart Comparing Example Claims of Parties [§41.202(a)(3)]

Pursuant to Section 41.202(a)(3), certain example claims of the parties are compared below:

Claim 23/22 of 09/406,684	Claim 2/1 of U.S. 6,410,358
(a) A method of making a reflective liquid crystal display, the method comprising: (b) applying a photosensitive resin to a substrate; (c) forming asperities which do not extend all the way through the resin in a first region of the photosensitive resin by using a first photomask and exposing at least part of the first region using said first photomask; (d) forming contact holes in a second region of the photosensitive resin using a second photomask different than the first photomask, and exposing at least part of the second region using said second photomask;	(a) A manufacturing method for a reflection type liquid crystal display having a reflection film for reflecting light having passed through a liquid crystal layer, the method comprising: (gg) forming a thin film transistor on a substrate; (b) forming a photosensitive resin film on the thin film transistor; (d1) exposing the photosensitive resin film with a first unit exposure light amount via a (h1) first mask; (c1) exposing the photosensitive resin film with a second unit exposure light amount

[1] The parenthetical alphabetical prefaces to claim paragraphs in the charts herein are not included in the claims themselves and do not limit the claims in any way with respect to order or otherwise; these alphabetical prefaces are provided for ease in assessing corresponding features.

(e) developing the exposed photosensitive resin; (f) heat treating the developed photosensitive resin; (g) forming a reflective electrode on the heat treated photosensitive resin over asperities so that said reflective electrode is in communication with at least one (gg) switching element through at least one of the contact holes; and (h) wherein each of said first and second photomasks comprise both light transmitting portions for transmitting illuminance and light intercepting portions for blocking illuminance from reaching the photosensitive resin so that the asperities and contact hole are formed based upon arrangement of the light transmitting portions and light intercepting portions in the photomasks (i) wherein uniform and low-illuminance exposure is performed so as to expose the photosensitive resin using the first photomask, while uniform and higher illuminance exposure is performed so as to expose the photosensitive resin using the second photomask.	via a (h2) second mask; (e) developing the photosensitive resin film subjected to two exposures thereby forming two types of concaves having different depths; and (g1) forming a film using a reflective material on the photosensitive resin developed to have two types of concaves, thereby forming the reflection film; wherein the photosensitive resin film constitutes an insulating film, the reflection film is a reflection electrode having a size corresponding to a pixel, and (g2) the reflection electrode is electrically connected to the thin film transistor, and (i) wherein the first unit exposure light amount is larger than the second unit exposure light amount, (d2) the concave formed using the first mask constitutes a contact hole for electrically connecting the reflection electrode and the thin film transistor, and (c2) the concave formed using the second mask constitutes a concave formed on a surface of the reflection electrode (f) heating the photosensitive resin film to give edges of the concave a gentler slope after developing the photosensitive resin film.

The aforesaid claim chart comparing claim 23 of the instant application to claim 2 of the '358 Patent illustrates how the two claims relate to common patentable subject matter, and define a single invention. For example, the subject matter of claim 23 of the instant application, if prior

art, would anticipate or render obvious the subject matter of claim 2 of the '358 Patent, and vice versa.

Why Applicant Will Prevail on Priority {§41.202(a)(4)}

The applicant of 09/406,684 will prevail on priority because applicant invented the interfering subject matter well before Noritake et al. In particular, the applicant of 09/406,684 claims priority on dates of at least September 28, 1998 and September 29, 1998 under 35 U.S.C. Section 119, both of which are well prior to Noritake's claimed foreign priority date of July 14, 1999. Applicant's foreign priority documents, filed September 28, 1998 and September 29, 1998, respectively, support pending claims of applicant which correspond to the count. As mentioned above, English translations of applicants' foreign priority documents have been filed herewith for the convenience of the Examiner. Moreover, applicant can establish a date of invention well prior to September 28, 1998 if needed.

Charts for Written Description for New Claims 108-122 {§41.202(a)(5)}

To the extent needed, set forth below are claim charts indicating example non-limiting written description support (see right-hand column) for subject matter set forth in new claims 108-122.

Claim 108. A method for fabricating a liquid crystal display, the method comprising: depositing a negative photosensitive insulation film on a substrate; as part of forming a contact hole which extends all the way through the photosensitive insulation film, exposing part of the negative photosensitive insulation film using a first mask including a light blocking portion and a	Example Support: See Figs. 1-5, 8, 17-19, and the corresponding description of these figures in the specification. E.g., see pages 7-23, 27-31, and 34-37.

light transmitting portion; as part of forming asperities in a surface of the photosensitive insulation film which do not extend all the way through the photosensitive insulation film, exposing part of the negative photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion, wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts; developing and removing parts of the negative photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film; heating the photosensitive insulation film; and forming a reflection electrode on a selected portion of the photosensitive insulation film on the substrate, so that the reflection electrode is located over at least some of the asperities and is in electrical communication with a transistor via the contact hole.	
Claim 109 The method of claim 108, wherein the first exposure provides an exposure amount of from 20 mj to 100 mj, and wherein the second exposure provides an exposure amount of from 160 mj to 500 mj.	Example Support: Page 29, lines 1-15.
Claim 110 The method of claim 108, wherein the steps are performed in the order in which they are recited.	Example Support: See Fig. 3 and corresponding description.
Claim 111 The method of claim 108, wherein center-to-center distances between adjoining	Example Support: Page 21, lines 6-16; page 29, lines 17-21.

light transmitting portions of the second mask are in a range of from 5 to 50 μm.	
Claim 112 The method of claim 108, wherein the display comprises a transmissive/reflective liquid crystal display.	Example Support: See Figs. 15-17, and description thereof.
Claim 113 The method of claim 108, wherein the exposure using the second mask is performed prior to the exposure using the first mask.	Example Support: Fig. 8 and description thereof.
Claim 114 A manufacturing method for a reflection type liquid crystal display having a reflection film for reflecting light having passed through a liquid crystal layer, the method comprising: forming a thin film transistor on a substrate; forming a photosensitive resin film on the thin film transistor; exposing the photosensitive resin film with a first unit exposure light amount via a first mask; exposing the photosensitive resin film with a second unit exposure light amount via a second mask; developing the photosensitive resin film subjected to two exposures thereby forming two types of concaves having different depths; and forming a film using a reflective material on the photosensitive resin developed to have two types of concaves, thereby forming the reflection film; wherein the photosensitive resin film constitutes an insulating film, the reflection film is a reflection electrode having a size	Example Support: Figs. 1-11, and corresponding descriptions thereof. For instance, see page 7, line 19 to page 23, line 12; page 38, line 1 to page 41, line 12.

corresponding to a pixel, and the reflection electrode is electrically connected to the thin film transistor, and wherein the first unit exposure light amount is larger than the second unit exposure light amount, the concave formed using the first mask constitutes a contact hole for electrically connecting the reflection electrode and the thin film transistor, and the concave formed using the second mask constitutes a concave formed on a surface of the reflection electrode.	
Claim 115 A manufacturing method according to claim 114, further comprising heating the photosensitive resin film to give edges of the concave a gentler slope after developing the photosensitive resin film.	Example Support: See Fig. 9D-9E; page 40, lines 8-10.
Claim 116 A manufacturing method for a reflection type liquid crystal display having a reflection film for reflecting light having passed through a liquid crystal layer, the method comprising: forming a thin film transistor on a substrate; forming a photosensitive resin film on the thin film transistor; exposing the photosensitive resin film with a first unit exposure light amount via a first mask; exposing the photosensitive resin film with a second unit exposure light amount via a second mask; developing the photosensitive resin film subjected to two exposures thereby forming two types of concaves having different depths; and forming a film using a reflective	Example Support: Figs. 1-11, and corresponding descriptions thereof. For instance, see page 7, line 19 to page 23, line 12; page 38, line 1 to page 41, line 12.

material on the photosensitive resin developed to have two types of concaves, thereby forming the reflection film; wherein the photosensitive resin film constitutes an insulating film, the reflection film is a reflection electrode having a size corresponding to a pixel, and the reflection electrode is electrically connected to the thin film transistor, and wherein the second unit exposure light amount is larger than the first unit exposure light amount, the concave formed using the first mask constitutes a concave formed on a surface of the reflection electrode, and the concave formed using the second mask constitutes a contact hole for electrically connecting the reflection electrode and the thin film transistor.	
Claim 117 A manufacturing method according to claim 116, further comprising heating the photosensitive resin film to give edges of the concave a gentler slope after developing the photosensitive resin film.	Example Support: See Fig. 9D-9E; page 40, lines 8-10.
Claim 118 A manufacturing method for a reflection type liquid crystal display having a plurality of reflection electrodes for reflecting light having passed through a liquid crystal layer, the method comprising: forming a lower conductive film on a substrate; forming a photosensitive resin film on a thin film transistor; exposing the photosensitive resin film with a first unit exposure light amount via a first mask and exposing the photosensitive resin film with a second unit exposure light	Example Support: Figs. 1-11, and corresponding descriptions thereof. For instance, see page 7, line 19 to page 23, line 12; page 27, line 8 to page 31, line 13; page 38, line 1 to page 41, line 12.

amount which is greater than the first unit exposure light amount via a second mask at a different timing; developing the photosensitive resin film subjected to two exposures to simultaneously form a contact hole and a concave on a surface; and forming a film using a reflective material on the photosensitive resin film to thereby form the reflection electrodes; wherein the reflection electrodes connect with the lower conductive film via the contact hole and have a concave on a surface due to the concave of the photosensitive resin film.	
Claim 119 The manufacturing method according to claim 118, wherein the thin film transistor is formed on the substrate, and the lower conductive film constitutes the thin film transistor.	Example Support: See Fig. 2 and corresponding description; see also page 18, lines 4-6; page 27, line 19 to page 28, line 13.
Claim 120 A manufacturing method according to claim 118, further comprising heating the photosensitive resin film to give edges of the concave a gentler slope after developing the photosensitive resin film.	Example Support: See Fig. 9D-9E; page 40, lines 8-10. See also Figs. 3D-3E; and page 30, lines 1-11.
Claim 121 A manufacturing method according to claim 118, wherein the exposing the photosensitive resin film with the first unit exposure light amount is performed in advance of the exposing the photosensitive resin film with the second unit exposure light amount.	Example Support: See Figs. 3-5 and 9-11, and corresponding descriptions. For instance, see page 29, lines 1-18. See also page 38, line 20 to page 39, last line.
Claim 122 A manufacturing method according to claim 118, wherein the exposing the photosensitive	Example Support: See Figs. 3-5 and 9-11, and corresponding descriptions. For instance, see page 29, lines

resin film with the second unit exposure light amount is performed in advance of the exposing the photosensitive resin film with the first unit exposure light amount.	1-18. See also page 38, line 20 to page 39, last line.

Example Constructive Reductions to Practice {§41.202(a)(6)}

Applicant should be accorded the benefit of at least four (4) different constructive reductions to practice based on priority documents, namely the filing of each of the JP priority documents on: (a) September 28, 1998, (b) September 29, 1998, (c) June 16, 1999, and (d) June 16, 1999, respectively. English translations of these priority documents have been filed herewith.

The charts set forth below illustrates example non-limiting support in each constructive reduction to practice, respectively, of the alternative to the count corresponding identically to pending claim 28, for purposes of example and without limitation.

Chart A – JP 10-273244, filed September 28, 1998

Alternative to the Proposed Count, corresponding to pending claim 28	Example Support in JP 10-273244, filed September 28, 1998. The claim 28 alternative to the count reads on Tsuda priority document JP 10-273244 as follows, for example.
A method for fabricating a liquid crystal display, the method comprising:	A method for fabricating a liquid crystal display [e.g., JP 10-273244, claim 1, ¶¶ 0001, 0024, Figs. 1-7], the method comprising:
depositing a photosensitive insulation film on a substrate;	depositing a photosensitive insulation film {9} on a substrate {1} [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0050, Fig. 2a];
as part of forming a contact hole which extends all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a first	as part of forming a contact hole which extends all the way through the photosensitive insulation film {9}, exposing part of the photosensitive insulation film {9} using a first

mask including a light blocking portion and a light transmitting portion;	mask {20} including a light blocking portion {17} and a light transmitting portion {18} [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0027, 0033, 0052-53, Figs. 1, 2c-2d, 4];
as part of forming asperities in a surface of the photosensitive insulation film which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion, wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts;	as part of forming asperities in a surface of the photosensitive insulation film {9} which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask {19} including a light blocking portion {17} and a light transmitting portion {18} [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0029, 0034, 0051, 0057, Fig. 2b, 3], wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0029, 0034, 0037, 0051-52, Fig. 2b, 2c];
developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film;	developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film {9} [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0033-34, 0043, 0053, Figs. 1, 2d];
heating the photosensitive insulation film; and	heating the photosensitive insulation film [e.g., JP 10-273244, claim 1, ¶¶ 0024, 0034, 0054, Fig. 2e]; and
forming a reflection electrode on a selected portion of the photosensitive insulation film on the substrate, so that the reflection electrode is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole.	forming a reflection electrode {10} on a selected portion of the photosensitive insulation film {9} on the substrate, so that the reflection electrode {10} is located over at least some of the asperities and is in electrical communication with the transistor {24} via the contact hole [e.g., JP 10-273244, claim 4, ¶¶ 0024, 0027, 0033, 0047, 0055-57, Figs. 1, 2].

Chart B – JP 10-273245, filed September 28, 1998

Alternative to the Proposed Count, corresponding to pending claim 28	Example Support in JP 10-273245, filed September 29, 1998. The claim 28 alternative to the count reads on Tsuda priority document JP 10-273245 as follows, for example.
A method for fabricating a liquid crystal display, the method comprising:	A method for fabricating a liquid crystal display [e.g., JP 10-273245, claim 1, ¶¶ 0001, 0024, Figs. 1-7], the method comprising:
depositing a photosensitive insulation film on a substrate;	depositing a photosensitive insulation film {9} on a substrate {1} [e.g., JP 10-273245, claim 1, ¶¶ 0024, 0050, Fig. 2a];
as part of forming a contact hole which extends all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a first mask including a light blocking portion and a light transmitting portion;	as part of forming a contact hole which extends all the way through the photosensitive insulation film {9}, exposing part of the photosensitive insulation film {9} using a first mask {20} including a light blocking portion {18} and a light transmitting portion {17} [e.g., JP 10-273245, claim 1, ¶¶ 0024-25, 0034, 0051, page 25, Figs. 1, 2b-2d, 3];
as part of forming asperities in a surface of the photosensitive insulation film which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion, wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts;	as part of forming asperities in a surface of the photosensitive insulation film {9} which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask {19} including a light blocking portion {18} and a light transmitting portion {17} [e.g., JP 10-273245, claim 1, ¶¶ 0024, 0026-27, 0032-35, 0052, 0054, page 25, Fig. 2b-2d, 4], wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts [e.g., JP 10-273245, claim 1, ¶¶ 0024, 0029, 0034, 0037, 0051-52, Figs. 2b, 2c];
developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film;	developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film {9} [e.g., JP 10-273245, claim 1, ¶¶ 0024, 0033-34, 0043, 0053, Figs. 1, 2d];

heating the photosensitive insulation film; and	heating the photosensitive insulation film [e.g., JP 10-273245, claim 1, ¶¶ 0024, 0054, Fig. 2e]; and
forming a reflection electrode on a selected portion of the photosensitive insulation film on the substrate, so that the reflection electrode is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole.	forming a reflection electrode {10} on a selected portion of the photosensitive insulation film {9} on the substrate, so that the reflection electrode {10} is located over at least some of the asperities and is in electrical communication with the transistor {24} via the contact hole [e.g., JP 10-273245, claim 4, ¶¶ 0024-25, 0035, 0038, 0047, 0055-57, Figs. 1, 2].

Chart C – JP 11-169338, filed June 16, 1999

Alternative to the Proposed Count, corresponding to pending claim 28	Example Support in JP 11-169338, filed June 16, 1999. The claim 28 alternative to the count reads on Tsuda priority document JP 11-169338 as follows, for example.
A method for fabricating a liquid crystal display, the method comprising:	A method for fabricating a liquid crystal display [e.g., JP 11-169338, claim 1, ¶¶ 0001, 0024-0025, Figs. 1-13 and corresponding descriptions thereof], the method comprising:
depositing a photosensitive insulation film on a substrate;	depositing a photosensitive insulation film {9} on a substrate {1} [e.g., JP 11-169338, claim 1, ¶¶ 0024-25, Fig. 3a, Figs. 1-13 and corresponding descriptions thereof];
as part of forming a contact hole which extends all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a first mask including a light blocking portion and a light transmitting portion;	as part of forming a contact hole which extends all the way through the photosensitive insulation film {9}, exposing part of the photosensitive insulation film {9} using a first mask including a light blocking portion and a light transmitting portion [e.g., JP 11-169338, claim 1, ¶¶ 0025, Figs. 3b, 4, 8c, 11b, 12, and corresponding descriptions];
as part of forming asperities in a	as part of forming asperities in a surface of the

surface of the photosensitive insulation film which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion, wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts;	photosensitive insulation film {9} which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion [e.g., JP 11-169338, claim 1, ¶¶ 0025, Figs. 3c, 5, 8b, 9, 10, 11c, 13 and corresponding descriptions], wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts [e.g., JP 11-169338, claim 1, ¶¶ 0025, 0031, 0035, 0049, 0060-61];
developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film;	developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film {9} [e.g., JP 11-169338, claim 1, ¶¶ 0025, 0063];
heating the photosensitive insulation film; and	heating the photosensitive insulation film [e.g., JP 11-169338, claim 1, ¶¶ 0025, 0064, Figs. 3d-3e, 6c-6d, 8d-8e, 10, 11d-11e and corresponding descriptions]; and
forming a reflection electrode on a selected portion of the photosensitive insulation film on the substrate, so that the reflection electrode is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole.	forming a reflection electrode {10} on a selected portion of the photosensitive insulation film {9} on the substrate, so that the reflection electrode {10} is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole [e.g., JP 11-169338, claims 1-2, ¶¶ 0025-26, Figs. 1-3, 6, 8-11 and corresponding descriptions].

Chart D – JP 11-169339, filed June 16, 1999

Alternative to the Proposed Count, corresponding to pending claim 28	Example Support in JP 11-169339, filed June 16, 1999. The claim 28 alternative to the count reads on Tsuda priority document JP 11-169339 as follows, for example.

A method for fabricating a liquid crystal display, the method comprising:	A method for fabricating a liquid crystal display [e.g., JP 11-169339, claim 1, ¶¶ 0001, 0024-25, Figs. 1-13 and corresponding descriptions thereof], the method comprising:
depositing a photosensitive insulation film on a substrate;	depositing a photosensitive insulation film {9} on a substrate {1} [e.g., JP 11-169339, claim 1, ¶¶ 0024-25, Fig. 3a, Figs. 1-12 and corresponding descriptions thereof];
as part of forming a contact hole which extends all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a first mask including a light blocking portion and a light transmitting portion;	as part of forming a contact hole which extends all the way through the photosensitive insulation film {9}, exposing part of the photosensitive insulation film {9} using a first mask including a light blocking portion and a light transmitting portion [e.g., JP 11-169339, claim 1, ¶¶ 0024, Figs. 3c, 5, 8c, 11c, and corresponding descriptions];
as part of forming asperities in a surface of the photosensitive insulation film which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion, wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts;	as part of forming asperities in a surface of the photosensitive insulation film {9} which do not extend all the way through the photosensitive insulation film, exposing part of the photosensitive insulation film using a second mask including a light blocking portion and a light transmitting portion [e.g., JP 11-169339, claim 1, ¶¶ 0024, Figs. 3b, 4, 8b, 9, 11b, and corresponding descriptions], wherein exposures using the first mask and the second mask, respectively, are of different exposure amounts [e.g., JP 11-169339, claim 1, claim 7, ¶¶ 0024, 0030, 0059-60];
developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film;	developing and removing parts of the photosensitive insulation film so as to form at least the contact hole and the asperities in the photosensitive insulation film {9} [e.g., JP 11-169339, claim 1, ¶¶ 0024, 0061, Figs. 1-13 and corresponding descriptions];
heating the photosensitive insulation film; and	heating the photosensitive insulation film [e.g., JP 11-169339, claim 1, ¶¶ 0024, 0062, Figs.

	3d-3e, 6c-6d, 8d-8e, 10, 11d-11e and corresponding descriptions]; and
forming a reflection electrode on a selected portion of the photosensitive insulation film on the substrate, so that the reflection electrode is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole.	forming a reflection electrode {10} on a selected portion of the photosensitive insulation film {9} on the substrate, so that the reflection electrode {10} is located over at least some of the asperities and is in electrical communication with the transistor via the contact hole [e.g., JP 11-169339, claims 1-2, ¶¶ 0024-25, Figs. 1-3, 6, 8-11 and corresponding descriptions].

In view of the above, it is respectfully requested that an interference be declared between the instant application and U.S. Patent No. 6,410,358, with the applicant Tsuda et al. being the named senior party. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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